

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**  
Baltimore Division

In Re:

SAVGIL YEVDAYEV

Debtor

Case No.: 14-20840-RAG

Chapter 7

\* \* \* \* \*

BRIAN A GOLDMAN, TRUSTEE

Movant/Plaintiff,

Adv. Proc. No.:15-00031

v.

STELLA YEVDAYEV

&

SAVGIL YEVDAYEV

Respondents/Defendants.

\* \* \* \* \*

**RESPONSE TO COMPLAINT TO AVOID AND RECOVER FRAUDULENT  
TRANSFER**

Defendant, Savgil Yevdayev, by and through his attorneys, Anthony Hayes Davis II, Esq., and in response to Trustee's Complaint to Avoid and Recover Fraudulent Transfer, respectfully states as follows:

1. Defendant has no objection to the relief sought by Plaintiff in the instant Complaint, namely that the transfer of the Property be rendered void in accordance with 11 U.S.C. § 548 and that the Property be transferred back to the Debtor and the Chapter 7 Estate for the benefit of the Debtor's creditors.

2. Defendant maintains that the transfer was not done with the actual intent to hinder, delay or defraud his creditors but, an absence of good faith having been declared, makes no further challenge to the allegation(s) as stated in the Complaint.
3. Debtor admits that the transfer was made for less than a reasonably equivalent consideration (zero consideration) and the debtor was unable to pay his debts either at the time the transfer was made or as a result of the transfer itself.
4. The transfer occurred while the debtor was engaged in business with an unreasonably small capital.
5. Defendant is the initial transferee of the transfer.
6. Defendant has listed the Property for sale with the intent to surrender the value of such property to the Estate to be liquidated by the Trustee for the benefit of the creditors. Any offers on the Property will be submitted to the Trustee immediately for consideration.

WHEREFORE, Savgil Yevdayev, Defendant, requests that the relief requested by the Trustee in the Complaint to Avoid and Recover Fraudulent Transfer be granted, and for such other and further relief this Court determines to be just and equitable.

Respectfully submitted,

/s/ Anthony Hayes Davis II  
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